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EXHIBIT A
[Proposed] Order Concerning the Applicability of Inverse Condemnation

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No.
19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**[PROPOSED] ORDER CONCERNING
THE APPLICABILITY OF INVERSE
CONDEMNATION**

1 On October 25, 2019, PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric
2 Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the
3 “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), the Official
4 Committee of Unsecured Creditors and certain PG&E Shareholders filed the Joint Brief of Debtors
5 and the Official Committee of Unsecured Creditors and Supplemental Statement of the PG&E
6 Shareholders Concerning the Applicability of Inverse Condemnation. After full consideration of all
7 of the parties’ submissions on this issue, the Court’s record and file in this matter, and the arguments
8 of counsel, and good cause appearing the Court finds and **IT IS HEREBY ORDERED THAT:**

9 1. Inverse condemnation does not apply to investor-owned utilities such as PG&E under
10 applicable California Supreme Court precedent;

11 2. The application of inverse condemnation to investor-owned utilities such as PG&E
12 would violate the Takings and Due Process Clauses of the U.S. Constitution.

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14 **** END OF ORDER ****
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